

IN THE UNITED STATES BANKRUPTCY COURT

FOR THE DISTRICT OF DELAWARE

2025 NOV 13 A 8:00

U.S. BANKRUPTCY COURT
DISTRICT OF DELAWARE

In re:
FTX Trading Ltd., et al.,
Debtors.

Chapter 11
Case No. 22-11068 (KBO)
(Jointly Administered)

**HEJIA ZHAO's MOTION FOR A BRIEF EXTENSION OF TIME TO FILE OBJECTION
TO THE FTX RECOVERY TRUST'S MOTION [D.I. 33444]**

Hejia Zhao (the "Movant"), a Class 5A creditor (Claim ID: 6718003) appearing pro se, respectfully moves, pursuant to Federal Rule of Bankruptcy Procedure 9006(b)(1) and 11 U.S.C. § 105(a), to enlarge the deadline for any creditor or party in interest to file objections to the FTX Recovery Trust's Motion for Entry of an Order Extending (I) the Claims Objection Deadline and (II) the Administrative Claims Objection Deadline (D.I. 33444) (the "Motion to Extend"). Movant requests that the Court extend the objection deadline to **November 17, 2025 at 4:00 p.m. (Eastern Time)**.

BACKGROUND

1. On November 3, 2025, the FTX Recovery Trust filed the Motion to Extend and noticed it for hearing on November 20, 2025 at 9:30 a.m. (ET), setting an objection deadline of November 13, 2025 at 4:00 p.m. (ET)—only ten days after filing.
2. On November 6, 2025, the Trust filed a Notice of Rescheduled Omnibus Hearing, moving the hearing to **November 24, 2025 at 9:30 a.m. (ET)**.
3. Many creditors in this case reside outside the United States. As a pro se creditor residing internationally, Movant faces mail and logistical delays that make a ten-day objection window inadequate to obtain notice, prepare a response, and file an objection.

RELIEF REQUESTED

4. Movant requests a brief, four-day extension of the objection deadline, from November 13, 2025, to **November 17, 2025 at 4:00 p.m. (ET)**.

BASIS FOR RELIEF

5. Rule 9006(b)(1) authorizes the Court, for cause shown, to enlarge time periods prescribed by the rules or by court order when the request is made before the original time expires. The requested enlargement is sought before the current deadline and is modest in duration.

6. Good cause exists: (a) international mailing constraints make ten days insufficient for many creditors, particularly pro se; and (b) the hearing has been rescheduled to November 24, 2025, so a short extension will not prejudice any party or impact the hearing. The extension promotes fairness and ensures that similarly situated creditors have a meaningful opportunity to be heard.

7. The relief requested is consistent with the Local Rules, which contemplate objection deadlines no earlier than fourteen days after service and no later than seven days before the hearing, and with this Court's discretion to manage briefing schedules in the interests of justice.

CONCLUSION

WHEREFORE, Movant respectfully requests that the Court enter the proposed order extending the objection deadline to **November 17, 2025 at 4:00 p.m. (ET)**, and grant such other and further relief as the Court deems just and proper.

Dated: November 7, 2025

Respectfully submitted,

A handwritten signature in black ink that reads "Hejia Zhao". The signature is written in a cursive, flowing style.

Hejia Zhao (pro se)

[Apt redacted], Mood Lyndhurst, 38 Lyndhurst Terrace, Central, Hong Kong
Email: hz263@cornell.edu | Tel: +86-189-246-71668

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:
FTX Trading Ltd., et al.,
Debtors.

Chapter 11
Case No. 22-11068 (KBO)
(Jointly Administered)

**ORDER GRANTING HEJIA ZHAO's MOTION FOR A BRIEF EXTENSION OF TIME
TO FILE OBJECTION TO THE FTX RECOVERY TRUST'S MOTION [D.I. 33444]**

Upon consideration of the motion (the "Motion") of creditor Hejia Zhao (pro se) for a brief extension of time to file objection to the FTX Recovery Trust's Motion [D.I. 33444], and the Court having jurisdiction to consider the Motion; and after due deliberation and sufficient cause appearing, IT IS HEREBY ORDERED THAT:

1. The Motion is ****GRANTED**** as set forth herein.
2. The deadline for any creditor or party in interest to file and serve any objection or response to the FTX Recovery Trust's Motion to Extend (D.I. 33444) is extended through and including ****November 17, 2025 at 4:00 p.m. (Eastern Time)****.
3. The hearing on the Motion to Extend remains scheduled for ****November 24, 2025 at 9:30 a.m. (Eastern Time)****, and the Court will consider any timely objections at that time.
4. The Court retains jurisdiction to hear and determine all matters arising from the implementation of this Order.

Dated: _____, 2025
Wilmington, Delaware

The Honorable Karen B. Owens
Chief United States Bankruptcy Judge

CERTIFICATE OF SERVICE

I, Hejia Zhao, certify that on November 7, 2025, I caused a true and correct copy of the foregoing Motion and proposed order to be served by electronic mail and by U.S. Mail on the following:

U.S. Trustee – District of Delaware

- Juliet M. Sarkessian – juliet.m.sarkessian@usdoj.gov
- Benjamin A. Hackman – benjamin.a.hackman@usdoj.gov
- David Gerardi – david.gerardi@usdoj.gov

Counsel to the FTX Recovery Trust – Sullivan & Cromwell LLP

- Andrew G. Dietderich – dietdericha@sullcrom.com
- James L. Bromley – bromleyj@sullcrom.com
- Brian D. Glueckstein – gluecksteinb@sullcrom.com
- Alexa J. Kranzley – kranzleya@sullcrom.com

Delaware Counsel to the Trust – Landis Rath & Cobb LLP

- Adam G. Landis – landis@lrclaw.com
- Kimberly A. Brown – brown@lrclaw.com
- Matthew R. Pierce – pierce@lrclaw.com
- Matthew B. McGuire – mcguire@lrclaw.com

If any party does not consent to email service, I will promptly effect service by mail consistent with the Federal Rules of Bankruptcy Procedure and the Local Rules.

Dated: November 7, 2025



Hejia Zhao (pro se)

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November 7, 2025

CLERK
U.S. BANKRUPTCY COURT
DISTRICT OF DELAWARE

Clerk of Court
United States Bankruptcy Court for the District of Delaware
824 North Market Street, 3rd Floor
Wilmington, DE 19801

Re: In re FTX Trading Ltd., et al., Case No. 22-11068 (KBO)

Dear Clerk:

Enclosed for filing please find the "Hejia Zhao's Motion for a Brief Extension of Time to File an Objection to the FTX Recovery Trust's Motion [D.I. 33444]," together with a proposed form of order and certificate of service. I am filing promptly upon learning that the omnibus hearing has been rescheduled from November 20, 2025 to November 24, 2025.

Respectfully submitted,



Hejia Zhao (pro se)

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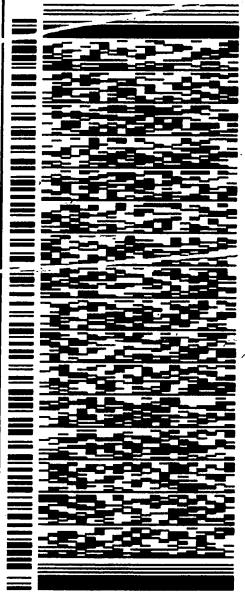
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